

JAP:MEM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

CHEVELLE NESBETH,

Defendant.

COMPLAINT

(21 U.S.C. §§ 952(a) and 960))

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER CHEN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 6, 2015, within the Eastern District of New York and elsewhere, the defendant CHEVELLE NESBETH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about January 6, 2015, the defendant CHEVELLE NESBETH arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue Airlines Flight B6 780 from Montego Bay, Jamaica.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

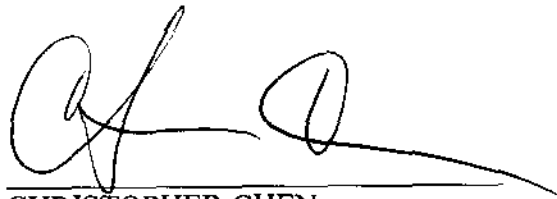
2. Defendant CHEVELLE NESBETH was selected for a Customs and Border Protection ("CBP") examination. After answering standard CBP examination questions, both bags that were possessed by the defendant were inspected. Upon initial inspection, it was noted that the suitcase handle on bag number one did not fully extend out. A probe of this handle was conducted revealing a white powdery substance. The defendant CHEVELLE NESBETH was escorted to a private examination area where the bags in question were further searched.

3. During the search, a CBP Officer inspected the suitcase handle of bag number two which also contained a white powdery substance. The white powdery substance from bag number one and bag number two both field-tested positive for the presence of cocaine. The defendant CHEVELLE NESBETH was placed under arrest.

4. The total approximate gross weight of the cocaine recovered from the defendant CHEVELLE NESBETH was 1,212 grams.

WHEREFORE, your deponent respectfully requests that defendant CHEVELLE NESBETH be dealt with according to law.

Dated: Brooklyn, New York
January 6, 2015



CHRISTOPHER CHEN
Special Agent
Homeland Security Investigations

Sworn to before me on
the 6 day of January, 2015

S/ Viktor Pohorelsky

THE HONORABLE VICTOR V. POHOREISKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK